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*ADMITTED IN DC ONLY

November 5, 2014

Re: *HLP Properties, LLC, et al v. Consolidated Edison Co. of New York, Inc.*, No. 14-CV-1383 (LGS) (S.D.N.Y.)

Dear Judge Schofield:

We represent Defendant Consolidated Edison Company of New York, Inc. ("Con Edison") in the above-captioned matter. We submit this letter to provide the Court with the information requested at yesterday's conference regarding Con Edison's MGP project managers and their supervisor.

Kenneth Kaiser is the Section Manager of MGP Remediation in Con Edison's Environmental Health & Safety department with overall responsibility for the MGP program. Mr. Kaiser has responsibility for the supervision of all MGP project managers at all of Con Edison's MGP sites, including the three involved here. The project managers at the MGP sites that correspond to the 5 parcels chosen by Plaintiffs are: (1) Neil O'Halloran, Project Manager, West 18th Street MGP Site (the site that includes the Plaintiffs' parcel), (2) Richard Rienzo, Project Manager, West 42nd Street MGP Site (3) and Yelena Skorobogatov, Project Manager, White Plains MGP Site. These three project managers each manage between 5 to 7 MGP sites. Their primary responsibilities are to develop schedules and budgets, oversee consultants and act as points of contact with property owners and the DEC.

Respectfully submitted,

/s/ Thomas J. Kavalier

Thomas J. Kavalier

CAHILL GORDON & REINDEL LLP

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The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

cc: All Counsel (via ECF)